

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE

IN RE: VALSARTAN N-
NITROSODIMETHYLAMINE (NDMA),
LOSARTAN, and IRBESARTAN PRODUCTS
LIABILITY LITIGATION

Civil No. 19-2875 (RBK/JS)

ORDER

The Court having held a conference call with the parties on October 28, 2020; and this Order intending to confirm the Court's rulings; and accordingly, it is hereby

ORDERED this 30th day of **October 2020**, as follows:

- 1) The outside date to start the depositions of the class action plaintiffs and manufacturer defendants¹ is changed from January 15, 2021 to **January 19, 2021**.
- 2) The deadline to finalize the parties' general deposition protocol is **November 11, 2020**. All disputes not raised before this date shall be deemed waived. The deadline to finalize the addendums to the general deposition protocol is **November 24, 2020**. All disputes not raised before this date shall be deemed waived.
- 3) The parties' deposition protocol shall include a requirement that the person(s) who will appear in response to a Fed.R.Civ.P.30(b)(6) deposition notice shall be identified at least fourteen (14) days before the first date the deposition is scheduled.
- 4) As to all depositions, the lead questioner and attorney defending the deposition shall be identified as soon as practicable but no later than fourteen (14) days before the first date the deposition is scheduled.

¹ The manufacturer defendants include the API and finished dose parties.

- 5) As soon as practicable but no later than **November 24, 2020**, plaintiffs shall identify a contact attorney from their group who is responsible for coordinating all issues regarding the depositions of each manufacturer defendant such as scheduling, deposition location, necessity and identity of interpreter(s), length of deposition, etc.
- 6) All disputes regarding defendants' document requests directed to the class action plaintiffs shall be raised before the **November 11, 2020** conference call. The Court expects to address and decide these disputes during the November 11 call.
- 7) The Court will hold oral argument on Teva's discovery dispute with plaintiffs during the **November 11, 2020** conference call.
- 8) The Court repeats that depositions shall not be held up pending the production of all potentially responsive documents. To the extent relevant and material documents are produced after a deposition that should have been produced before the deposition, the Court will entertain a request to re-depose the witness.
- 9) In order to accommodate all issues to be addressed during the **November 11** conference call, the start time for the call is changed from 4:00 p.m. to **2:00 p.m. (EST)**. The usual call in and access numbers should be used. All letters the parties request the court to review to prepare for the conference call shall be served by **November 9, 2020**.

s/ Joel Schneider
JOEL SCHNEIDER
United States Magistrate Judge